

PELTON GRAHAM LLC

Brent E. Pelton

Taylor B. Graham

111 Broadway, Suite 1503

New York, NY 10006

(212) 385-9700

Attorneys for Plaintiffs, the FLSA Collective

And Settlement Class

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

**LUIS LOPEZ and BOBBY MORRISON,
Individually and On Behalf of All Others
Similarly Situated,**

Plaintiffs,

-against-

**UNIVERSAL PROTECTION SERVICE,
LLC d/b/a ALLIED UNIVERSAL
SECURITY SERVICES and
ALLIEDBARTON SECURITY
SERVICES LLC, Jointly and Severally,**

Defendants.

Case No. 1:22-cv-1990 (SJB)

**NOTICE OF PLAINTIFFS' MOTION FOR
FINAL APPROVAL OF FLSA COLLECTIVE AND CLASS SETTLEMENT AND FOR
APPROVAL OF CLASS COUNSEL'S FEES AND COSTS**

PLEASE TAKE NOTICE that, upon the annexed declaration of Brent E. Pelton, Esq., sworn to September 12, 2023, the exhibits annexed thereto, the annexed declaration of Jennifer Forst, the exhibits annexed thereto, the accompanying memorandum of law in support of the Plaintiffs' motion for final approval of the settlement agreement ("Motion for Final Approval"), and all the pleadings and proceedings heretofore had herein, the undersigned moves this Court, before the Honorable Sanket J. Bulsara, United States Magistrate Judge, in the United States

District Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for an Order:

- (1) granting final approval of the NYLL class settlement reached by the parties in this action as embodied in their Revised Settlement Agreement And Release (Dkt. No. 39-1);
- (2) granting final approval of the FLSA collective settlement;
- (3) granting enhancement awards to the Named Plaintiffs in the amount of \$2,500 each, in recognition of the services they rendered on behalf of the class;
- (4) awarding Class Counsel's attorneys' fees of one-third (1/3) of the Settlement Amount and reimbursement of litigation expenses in the amount of \$9,589.50;
- (5) awarding Settlement Administrator's fees of \$10,000.00; and
- (6) granting any such other and further relief as the Court may deem just and proper.

For the Court's convenience, attached hereto as **Exhibit 1** please find Plaintiffs' [PROPOSED] ORDER ON PLAINTIFFS' MOTION FOR FINAL APPROVAL OF FLSA COLLECTIVE AND CLASS SETTLEMENT AND APPROVAL OF CLASS COUNSEL'S FEES AND COSTS.

Dated: New York, New York
September 12, 2023

Respectfully submitted,

PELTON GRAHAM LLC

By: /s/Brent E. Pelton
Brent E. Pelton
Taylor B. Graham
111 Broadway, Suite 1503
New York, New York 10006
Telephone: (212) 385-9700
Facsimile: (212) 385-0800

*Attorneys for Plaintiffs, the FLSA Collective
and Settlement Class*